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4 **UNITED STATES DISTRICT COURT**
5 **DISTRICT OF ARIZONA**
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9 Zhang JC, an individual,

Case No. 24-cv-267-SMB

10 Plaintiff/Counterdefendant,

[PROPOSED ORDER AND PROPOSED]
FINAL JUDGMENT

11 v.
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13 Chai Research Corp,

14 Defendant/Counterclaimant
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16 This matter came before the Court on a Motion for Default Judgment and Motion
17 for Summary Judgment filed by Defendant/Counterclaimant Chai Research Corp.
18 (“Chai”). Based on the motion, response (if any) and reply (if any), the Court finds and
19 orders as follows:

20 **IT IS HEREBY ORDERED** pursuant to Fed. R. Civ. P. 55, Chai’s motion for
21 default judgment is **GRANTED** as to Chai’s counterclaim. The Court finds, adjudges and
22 decrees Plaintiff/Counterdefendant Zhang JC’s registration, use and trafficking of the
23 domain names Chai-ai.app and chainsfw.com constitute cybersquatting under 15 U.S.C. §
24 1125(d). To the extent such relief has not already been obtained in any administrative or
25 arbitral proceeding brought by Chai pursuant to the Uniform Domain-Name Dispute-
26 Resolution Policy (“UDRP”), the Court finds Chai is entitled to an order of forfeiture or
27 cancellation and transfer to Counterclaimant of the domain names <chai-ai.app>
28 <chainsfw.com> pursuant to 15 U.S.C. § 1125(d)(1)(A)(C).

1 **IT IS HEREBY FURTHER ORDERED** pursuant to Fed. R. Civ. P. 56, Chai's
2 motion for summary judgment is **GRANTED** as to all claims for relief set forth in Zhang
3 JC's Complaint. The Court finds based on the pleadings and arguments submitted, there
4 are no material facts in dispute and that Chai is entitled to judgment as a matter of law as
5 to all claims in the Complaint.

6 **IT IS HEREBY FURTHER ORDERED** that Chai having advised the Court that
7 it waives any claim to attorney's fees and costs, the Court declines to address the issue of
8 costs or fees.

9 DONE AND ORDERED this date.

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11 DATED: _____

Honorable Susan M. Brnovich
United States District Judge